

**Testimony Regarding CON Review Standards for
Psychiatric Beds and Services
January 31, 2006**

Thank you for the opportunity to provide testimony concerning the CON Review Standards for Psychiatric Beds and Services.

My name is Monica Harrison and I am a Senior Planning Analyst for Oakwood Healthcare System in Dearborn. Oakwood Healthcare, Inc. operates four licensed hospitals with 1307 inpatient hospital beds in west and southwest Wayne County and offers an array of hospital outpatient, diagnostic, physician, and other medical services, including inpatient psychiatric services.

Oakwood Healthcare System urges the CON Commission to add the CON Review Standards for Psychiatric Beds and Services to its current work plan. It has been a number of years since the last comprehensive review of these Standards. Like other areas of health care, there have been considerable changes to the care delivery system for mental health services, including inpatient psychiatric services. Thus, we have concerns that the current CON Standards are obsolete in some respects. In addition, we believe that for these Standards to better meet the goals of cost, quality and access, a Standard Advisory Committee should review and consider:

- The addition of a high occupancy exception to permit a hospital to add more psychiatric beds if certain occupancy targets are attained. This could be similar to the acute-care hospital bed high occupancy exception.
- The current replacement zone for psychiatric hospital beds given the considerable consolidation of the provider community in this State and reduction in the total number of providers.

Thank you for the opportunity to provide comment on this issue.

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